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October 26, 2007

California High-Speed Rail Authority
 925 L Street, Suite 1425
 Sacramento, CA 95814

RE: Draft Bay Area to Central Valley High-Speed Train (HST) Program EIR/EIS

On behalf of Audubon California, our 48 local chapters and 50,000 members statewide we write in strong opposition to the proposed alignment through Pacheco Pass. We believe this project will adversely harm the unique habitat values and avian resources of the Grasslands Ecological Area.

O008-1

The Grasslands Ecological Area is a wildlife habitat of hemispheric importance. It has been carefully preserved at considerable public expense and private investment for nearly a century. The proposed alignment through Pacheco Pass and the Grasslands will severely undo the conservation efforts that have made the Grasslands such an important part of California's natural landscape. Based on our review of the Pacheco Pass alignment, its bird related impacts present significant and unacceptable threat to California's environment.

Impact of the Pacheco Pass alignment on the Grasslands Important Bird Area

O008-2

The Project will adversely impact the Grasslands Important Bird Area, one of California's most important habitats for birds as determined by Audubon's ongoing scientific analysis of avian values, a part of a global ornithological effort led by Birdlife International. Through a process of scientific peer review Audubon California has designated 147 Important Bird Areas (IBA's) in California.

IBAs, are sites that provide essential habitat for one or more species of birds and they include sites for breeding, wintering, and/or migrating species. IBAs may be a few acres or thousands of acres, but usually they are discrete sites that stand out from the surrounding landscape. IBAs may include public or private lands, or both, and they may be protected or unprotected.

To qualify as an IBA, sites must satisfy at least one of the following criteria. The site must support:

- Species of conservation concern (e.g. threatened and endangered species)
- Restricted-ranges species (species vulnerable because they are not widely distributed)
- Species that are vulnerable because their populations are concentrated in one general habitat type or biome
- Species, or groups of similar species (such as waterfowl or shorebirds), that are vulnerable because they occur at high densities due to their congregatory behavior

The Grasslands Important Bird Area is a 160,000-acre mosaic of Central Valley floor habitats in the northern San Joaquin Valley. It lies in the historic plain of the San Joaquin River, in an area historically prone to devastating floods and poor farming soils. This vast network of freshwater marshes (permanent and seasonal), alkali grassland and riparian thickets is the result of decades of collaborative conservation agreements between private duck clubs, California State Parks and the Department of Fish and Game and the federal National Wildlife Refuge System. It is among the largest remaining areas of unplowed land on the floor of the Central Valley. This IBA is most notable for its abundance of native valley grassland and for its staggering concentrations of wintering waterfowl. It hosts over a half million individual ducks, geese and swans each year between November and February with Northern Pintail, Green-winged Teal, Northern Shoveler and Gadwall all having registered numbers in excess of 100,000 birds. It is also a major posts-breeding dispersal area for American White Pelican. This IBA consistently hosts large numbers of breeding Tricolored Blackbirds and may support over a third of the global population of this species in winter. A comparable percentage of Sandhill Cranes may occur in winter and Long-billed Curlews forage in its open pastures and fields, which host breeding colonies of Grasshopper Sparrow in the spring. Winter roosts of White-faced Ibis were estimated at over 10,000 birds, making it the second-largest concentration of the species in winter in California after the Imperial Valley, supporting roughly a third of the state's population. It is a major stopover site for shorebirds moving through the Central Valley, with an average of 10,000 each fall, winter and spring, and over 200,000 counted during peaks, earning it a distinction as a Western Hemisphere Shorebird Reserve Site in addition to its recognition as a RAMSAR site. Several heron rookeries have developed here, with an average of 300 nests of Double-crested Cormorant, Great Blue Heron and Great Egret. Dozens of pairs of Swainson's Hawk breed in the area, a significant percentage of the entire San Joaquin Valley population. The riparian bird community is best developed along the San Joaquin River in the northwest section of the IBA, which supports breeding Yellow-breasted Chat, large numbers of Blue Grosbeak as well as what is likely the southernmost large population of the California-endemic Yellow-billed Magpie on the floor of the Central Valley.

O008-2
Cont.

The Pacheco Pass route also has the potential of adversely affecting another **Audubon Important Bird Area**, the **Bolsa de San Felipe** near Gilroy. This site seasonally hosts over one percent of the global population of the Long-billed Curlew and is home to nine other sensitive bird species including the Northern Harrier, Ferruginous Hawk, Burrowing Owl, Loggerhead Shrike, Least Bell's Vireo, California Swainson's Thrush, Yellow Warbler, Yellow-breasted Chat, and the Tricolored Blackbird. Major features for wildlife include San Felipe Lake just south of Highway 152 about 10 miles east of Gilroy.

O008-3

In conclusion Audubon California strongly opposes the Pacheco Pass alignment of the High Speed Train Program. We urge the commission to avoid routing the project through the Grasslands Ecological Area and to find another alternative that would be less damaging to key natural values. If allowed to be built through the Grasslands the project will compromise a high value area for birds, recreation and nature education. Sacrificing this area, the object of major conservation investment and collaboration is clearly not in the public interest.

O008-4

Thank you very much for your consideration of our views.

Sincerely,



Daniel Taylor
Director of Public Policy